

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RUNCIE DOOKERAN, Individually
and On Behalf of All Others Similarly
Situating,

Plaintiff,

v.

XUNLEI LIMITED, LEI CHEN, ERIC ZHOU
and TAO THOMAS WU,

Defendants.

Case No. 1:18-cv-00467-RJS

PENG LI, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

v.

XUNLEI LIMITED, LEI CHEN, ERIC ZHOU
and TAO THOMAS WU,

Defendants.

Case No. 1:18-cv-00646-RJS

**DECLARATION OF ADAM M. APTON IN SUPPORT OF MOTION OF HESONG SUN
FOR CONSOLIDATION OF THE ACTIONS, APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF SELECTION OF COUNSEL**

I, ADAM M. APTON, hereby declare that:

1. I am an associate with the law firm Levi & Korsinsky, LLP, proposed lead counsel for movant Hesong Sun (“Movant”). I respectfully submit this declaration in support of Movant’s Motion for Consolidation of the Actions, Appointment as Lead Plaintiff and Approval of Selection of Counsel in the above-captioned actions.

2. Attached hereto as Exhibit A is a true and correct copy of the certification signed by Movant.

3. Attached hereto as Exhibit B is a true and correct copies of the loss chart detailing the Movant’s losses.

4. Attached hereto as Exhibit C is a true and correct copy of the press release announcing the filing of the first-filed action, which was filed in this Court on January 19, 2018.

5. Attached hereto as Exhibit D is a true and correct copy of the firm resume of Levi & Korsinsky, LLP.

I declare under the penalty of perjury that the foregoing is true to the best of my knowledge.

Dated: March 20, 2018

/s/ Adam Apton
Adam M. Apton